

30 January 1976

MEMORANDUM FOR: Director of Joint Computer Support
SUBJECT : Privacy Act of 1974

1. Attached is my critique of the DoDCI Computer System Privacy Course which I attended last week. To summarize, it is an excellent course and I recommend that our people attend. The course provides a greater awareness of the vulnerabilities of computer systems and the simple safeguards which can be implemented to protect them. It emphasizes the fact that everyone involved must understand why safeguards are imposed and cooperate in their use, or they may subvert and thwart a set of controls which they view as being arbitrarily imposed.

2. In view of recent events in several areas which have pointed out our vulnerabilities internally and on the customers' side, I intend to brief OJCS employees on the Privacy Act, using material supplied in the DoDCI course, and try to get started on security and privacy audits of our systems of records. I believe we are going to have to be in a position to show documented proof of what we are doing to ensure compliance with the Privacy Act.

3. I believe we are in better shape than most agencies with regard to the control and accuracy of computer files. Procedures do exist. But as in many areas of data processing, we have not done a thorough job of documentation because the incentives and pressures did not exist. With the Privacy Act and the threat of OMB audit, the incentive is now there.


Executive Officer, OJCS

STATINTL

Attachment: a/s

cc: Div/Staff Chiefs, OJCS

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19. This is an excellent course taught by qualified and skilled instructors who have combined course material from Computer Security courses with new material developed especially to address the Privacy Act of 1974. In this respect, it is a good multipurpose course for anyone working with computer-based information systems which contain classified data or data subject to the Privacy Act.

This course develops an understanding of the types of action necessary to design, manage and protect an automated "system of records", whether containing classified or "privacy" data. Instruction is directed to the major requirements of the law and their impact upon the data processing environment. Problems of data accuracy, privacy, and confidentiality are placed in perspective by providing a "total systems" approach to the diagnosis of the operational data processing environment. The emphasis is on the simple and practical safeguards which are currently available. Some of the material can also be found in standard computer systems analysis courses but much of it is unique to secure systems and not covered in commercial courses. Since the Act currently applies only to the Federal Government, it is not likely that commercial ADP training will be developed to cover the law. Also, the Agency computer systems have more in common with DoD than with the civilian agencies who will be trying to follow the Act.

The actual topics covered, in sessions ranging from one to two hours, in order of presentation, are as follows:

- Privacy Act of 1974 (PL 93-579) (includes DoD film on subject)
- Discussion of Privacy Act
- Analysis and Planning for Privacy
- Controls for Data Base Accuracy
- Disclosure Accounting and Dispute Handling
- Computer System Vulnerabilities
- Computer Resource Protection
- Data Base Protection
- Physical Access, Media and Personnel Controls
- Terminal Protection
- Administration and Auditing
- Privacy and Employee Education (includes set of visual aid masters and notes for employee briefing on return from course)

I highly recommend attendance at this course by any Agency employee responsible for the design, development, operation, or use of a computer based system containing information on individuals. Ideally, computer specialists and customers involved with a particular system should attend as a team. This is particularly important because the course stresses the shared responsibility of the computer specialists and computer users for ensuring that the provisions of the Privacy Act have been applied to computer based systems of records. It would be advisable for them to be familiar with the Agency regulation regarding implementation of the Privacy Act and the Systems of Records reported in the Federal Register by CIA. The course is scheduled for 50 runnings, one a week, on Tuesday through Thursday, over the next year. Four have been given as of 29 January 1976.

20. The speakers for this course, who I assume will remain the same for future runnings, are all competent and skilled instructors who know their material. They brief well in the traditional military style and use good visual aids. They also encourage questions and discussion.

One notable speaker is Lt. Cdr. G. Fairgrieve of the Royal Navy. He is extremely knowledgeable in the area of technical and procedural safeguards for computer installations, and is an entertaining speaker.